

MO AQM 3-29

Ms. Kyra Moore, Director
Missouri Department of Natural Resources
Air Pollution Control Program
1659 East Elm Street
Jefferson City, Missouri 65101

Dear Ms. Moore:

I am pleased to **partially** approve the 2015 Missouri Ambient Air Quality Monitoring Plan and the State of Missouri Five-year Air Monitoring Network Assessment. Both plans were reviewed and found to be in accordance with the provisions of 40 CFR Part 58.

Commented [MJ1]: I'm attempting to match this with the last paragraph, as it looks like we aren't fully approving the plan.

The 2015 Five-year Air Monitoring Network Assessment was submitted by MDNR in a letter dated June 29, 2015, and the 2015 Missouri Ambient Air Quality Monitoring Plan was submitted by the Missouri Department of Natural Resources on September 24, 2015. The 2015 annual network plan was posted on its website for public comment on June 15, 2015, as per 40 CFR Part 58. MDNR received comments from the U.S. Environmental Protection Agency or EPA and the Washington University School of Law. The comments generally related to the ambient air monitoring networks for the Ameren UE Labadie and Rush Island Energy Centers. MDNR responded to the EPA and Washington University School of Law comments in letters dated October 13, 2015, and November 19, 2015, respectively. MDNR made no changes to the plans as a result public comments.

With regards to the sulfur dioxide monitors in the annual plan at Ameren UE Labadie and Rush Island, we are taking no action with respect to these specific monitors. Because the sulfur dioxide monitors at Ameren UE Labadie and Rush Island Energy Centers are designated as special purpose monitors or SPM in the plans, we have not evaluated these monitors consistent with EPA's Data Requirements Rule for the 1-hour Sulfur Dioxide Primary National Ambient Air Quality standard nor the December 2013 Sulfur Dioxide Designations **Modeling** Technical Assistance Document or TAD. Should the MDNR pursue changing the designation of these monitors from **Special Purpose Monitoring** to a State or local air monitoring station or SLAMs for the purpose NAAQS compliance, EPA would then evaluate these monitors consistent with the Data Requirements Rule for the 1-hour Sulfur Dioxide Primary National Ambient Air Quality standard **and** the December 2013 Sulfur Dioxide Designations **Modeling** Technical Assistance Document.

Commented [MJ2]: In the previous draft that I saw, this was the "Monitoring" guidance. Any idea why it was changed?

Commented [MJ3]: Does this need to be capitalized? It isn't elsewhere.

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Commented [MJ4]: Monitoring?

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Office	APDB	CNSL	APDB	APDB	AWMD	OPA	RGAD
Name	Kemp	Meyer	Algoe-Eakin	Jay	Weber	Carey	Hague
Initial/Date	1/ /16	1/ /16	1/ /15	1/ /16	1/ /16	1/ /16	1/ /16

As such, EPA is approving MDNR's 2015 Annual Monitoring Network Plan, and the Five-year Air Monitoring Network Plan for all portions of the plans except the placement of special purpose sulfur dioxide monitors near Ameren UE Labadie and Rush Island Energy Centers. Your air monitoring staff is to be commended for its hard work and attention to detail while completing the annual network plan. Your actions and dedication directly support the Environmental Protection Agency's strategic air quality goals by operating and maintaining the Missouri air monitoring network.

Sincerely,

Mark Hague
Regional Administrator